

### **REMARKS**

Submitted herewith is a petition for a 3-month extension of time along with the appropriate fee.

Claims 1-14 are all the claims presently pending in the Application. Claims 1-2 stand rejected as anticipated by prior art. New claims 3-14 have been added.

It is noted that any claim amendments are made to merely clarify the language of each claim, and not for distinguishing the invention over the prior art, narrowing the claims or for any statutory requirements of patentability. It is further noted that, notwithstanding any claim amendments made herein, Applicant's intent is to encompass equivalents of all claim elements, even if amended herein or later during prosecution.

Claims 1-2 stand rejected as anticipated by Chakrabarti et al (U.S. Pat. No. 6,807,167). The rejections are respectfully traversed in view of the following discussion.

### **THE PRIOR ART REFERENCE**

The Examiner alleges that the ATM switch 141 and Local Bridge 146 and bridge 134 of Chakrabarti ("Ref. 1) anticipate the claimed switch and bridge of the PMC card, respectively. The Examiner is respectfully incorrect because the ATM switch 146 is a centralized, dedicated switch for circuit card 100 and connects each PMC 102-108 to

the ATM bus 138 (col. 3, l. 49-59). The claimed PMC card comprises a switch on the card itself (see Application, Fig. 2, No. 22) that has a "network port that allows the switch to connect directly to a second switch on the network," as recited in claim 1. This is not disclosed nor suggested by the architecture of Ref.1. None of the PMC cards in Ref. 1, have a switch to connect to a network. Each card is routed through the centralized ATM switch 141. The problem with Ref. 1 is the fundamental difference between centralized switching of the prior art and distributed switching of the claimed invention.

As described on page 1 of the Application, dedicated switches are typically implemented on dedicated switch cards. The present invention provides a novel device and system for switching to be distributed through the network fabric as shown in Figure 2 of the Application, rather than being handled at a central source (i.e. ATM switch of Ref. 1). The limitation of Ref. 1 is the same limitation discussed in the Background section of the Application: "A traffic managed bus requires a dedicated active backplane for signal transfer and dedicated control resources...a managed bus is not fully scalable and the speed of a managed bus will decrease with the addition of resources."

Thus, the present invention provides a solution for inter-processor and inter-board data connections. The presently claimed PMC and system provides scalability that cannot be performed by the card in Ref. 1 because of its limitation of the

centralized switch architecture. The device of claim 6, wherein the circuit card and PMC are claimed, and the system of claim 2, describing multiple cards on a network, both exemplify this difference in architecture.

Furthermore, due to the claimed switch being a part of the PMC, the claimed bridge is also part of the PMC card that connects **between** the switch and the data bus of a circuit card. Ref. 1. uses a completely different architecture. In Ref. 1, the local bridge 146 is a bridge between processors 114 and 116 and local PCI bus 148 (col. 5, lines 8-10). No bridge is used to connect any of the PMC's in Ref. 1 to PCI bus 148, they are shown directly connected to the line 148. Furthermore, bridges 134, 136 are part of the **processor** that bridge SDRAM 130, 132 to PPCs 114 and 116 (see col. 3, l. 1-10). The ATM switch is connected directly to the processors through lines 160 and 162, which is in turn connected bus 148. This is far different from the claimed invention, where the PMC itself has a bridge that bridges the PMC switch to the data bus itself without using a processor.

The system of the present invention which "allows the switch to connect directly to other switches on a network and a bridge that is connected between the switch and the circuit card data bus," as recited in claim 6, is not disclosed nor suggested by the architecture in Ref. 1. Claims 1, 2, and 6 all claims that the switch of the PMC, and thus the PMC, connects directly to other PMCs in the network as the way to perform distributed and shared processing.

Thus, the centralized switch and bridges between the processor and the switch

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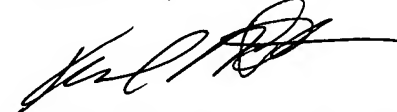
in Ref. 1 do not teach or suggest the claimed invention. The Examiner is respectfully requested to reconsider and withdraw the rejection.

### CONCLUSION

Applicant has revised the Figures to overcome the Examiner's objections. The specification was also amended to include the reference numeral 20, the PCM card, which is shown in Figure 2 but was inadvertently not placed in the text.

In view of the foregoing, Applicant submits that claims 1-14, all the claims presently pending in the Application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above Application to issue at the earliest possible time. The Commissioner is hereby authorized to charge any fees associated with this communication to Attorney's Deposit Account No. 50-1768.

Respectfully Submitted,



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I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: the Commissioner for Patents, United States Patent and Trademark Office, PO Box 1450, Alexandria, VA 22313-1450 on March 27, 2006.



3/27/06  
Kendal Sheets Date

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#### AMENDMENTS TO THE DRAWINGS

The attached replacement sheets of drawings includes changes to Figures 8 and 9. These sheets now include the labeling for Figures 8 and 9 to include the legend "PRIOR ART," as requested by the Examiner.

Attachment: 2 Replacement Sheets